Case 2:24-mj-30526-DUTY ECF No. 1 Page ID 1 Filed 12/12/24 Page 1 of 8 226-9100

AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Eli Bowers Telephone: (313) 965-2323

# UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America					
v. Antonio Hall Jr.		Case No.	Case: 2:24-mj-30526 Assigned To: Unassigned Assign. Date: 12/12/2024 Description: CMP USA V. HALL (DJ)		
	CRIMINAL COM	MPLAINT			
I, the complainant in this case	e, state that the following is	true to the b	est of my knowled	ge and belief.	
On or about the date(s) of	December 6, 2024	in	the county of	Wayne	in the
Eastern District of	Michigan , the defend	lant(s) viola	ted:		
Code Section	Offense Description				
18 U.S.C. § 2251(a) 18 U.S.C. § 2422(b) 18 U.S.C. § 2252A(a)(2)		Coercion a	n of Child Pornograp and enticement of a 1 child pornography.		
This criminal complaint is ba See attached affidavit.	sed on these facts:				
Continued on the attached sheet.		Complainant's signature Eli Bower, Special Agent-FBI			
	_		Printed name	and title	
Sworn to before me and signed in my presence Ind/or by reliable electronic means.					

December 12, 2024

City and state: Detroit, Michigan

Kimberly G. Altman, United States Magistrate Judge

Printed name and title

Judge's signature

# AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Eli Bowers, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

## INTRODUCTION AND AGENT BACKGROUND

- 1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since 2015 and am currently assigned to the FBI Detroit Division. Prior to being employed by the FBI, I was employed as a Park Ranger with the National Park Service for approximately six years, where my duties included the enforcement and investigation of federal crimes. While employed by the FBI, I have investigated numerous federal criminal violations related to child exploitation and child pornography. I have received training in investigating internet fraud, computer intrusions, and matters involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post Academy training, and everyday work related to conducting these types of investigations.
- 2. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. Moreover, I am a federal law enforcement

officer who is engaged in enforcing criminal laws, including 18 U.S.C. § 2252A. I am authorized by law to request an arrest warrant.

- 3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Antonio Hall Jr. for violations of 18 U.S.C. § 2251(a) (production of child pornography), 18 U.S.C. § 2422(b) (coercion and enticement of a minor), and 18 U.S.C. § 2252A(a)(2) (receipt of child pornography).
- 4. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent.
- 5. This affidavit is submitted for the limited purpose of securing a complaint and an arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that HALL has committed the offenses listed above.

### PROBABLE CAUSE

6. On December 6, 2024, agents of the Federal Bureau of Investigation (FBI) in Detroit, MI received information from a Detective from the Waukesha County Sheriff's Department in Wisconsin that an unknown subject, later identified

as Antonio HALL Jr., was utilizing the Telegram application to communicate with a 13-year-old male victim (MV1). Agents obtained information that HALL was presently located in Florida and conveyed the information to agents in the FBI Orlando Resident Agency.

- 7. The chat conversations between HALL and MV1 were obtained from MV1's cellular device and were provided to the FBI for review by law enforcement in Wisconsin. HALL and MV1 initially met on the social media application Instagram. HALL provided his phone number of (\*\*\*) \*\*\*-1732 to MV1, and they began exchanging text messages. The conversation then moved to Telegram. Based on my training and experience, Telegram is an encrypted chat application which allows for text messaging as well as the exchange of images and videos.
- 8. The Telegram chats between HALL and MV1 took place between April 4, 2024, and April 13, 2024. At the beginning of the conversation, MV-1 identified himself as being 13 years old. HALL then falsely identified himself as the same age. During the conversation, HALL requested that MV1 produce multiple images and videos that meet the federal definition of child pornography, hereinafter referred to as child sexual abuse material (CSAM). Additionally, HALL requested and directed MV1 to perform sexual acts on MV2, a minor under the age of 10 years old. MV1 complied and sent HALL several images and videos of MV1 sexually abusing MV2, as well as performing sexual acts himself.

- 9. For instance, HALL asked MV1, "so u will do stuff with [MV2] and I can send normal dick/ ass vids?" MV1 agreed, and HALL then asked "can I see [MV-2]?" HALL also specified that videos were better than video calls, because "we can keep seeing them."
- 10. After that exchange, MV1 sent HALL a 25-second-long video of MV1 naked standing over MV2 in bed. MV1 then rubbed his penis on MV2's head while MV1 masturbated. MV2 appeared to be asleep during the video. HALL then responded, "oh I can't rly see like that / can u hold ur ohone then." MV1 then created and sent HALL a 12-second video showing MV1 rubbing his naked penis on MV2's head. HALL directed MV1 to engage in further abuse of MV2, stating "like on his lips and eyes and stuff / but record with the camera in front of his face." MV1 stated that he tried to do that, but MV2 almost woke up.
- 11. HALL then sent MV1 a video of a male rubbing his partially exposed penis. HALL also sent other requests for MV1 to sexually assault MV2, such as by directing MV1 to "get on top of him like ur a cover / and hump him a bit."
- 12. HALL also asked MV1 what he wanted for his birthday. MV1 responded, "prob cod [Call of Duty] points." HALL offered to purchase points for MV1 once or twice every week, if MV1 agreed to become HALL's boyfriend. HALL asked MV1 to promise HALL that MV1 would only talk to HALL, and MV1 agreed.

- 13. HALL next asked MV1, "can I see ur balls." MV1 sent two pictures of his exposed penis and testicles to HALL. HALL responded "hottt" and "do more ball pics." MV1 then sent two additional pictures of his testicles, his exposed penis, and himself masturbating.
- 14. HALL sent an 8-second-long video to MV1, exposing his penis and anus.
- 15. HALL asked MV1 if he could ejaculate on MV2's eyes and mouth. MV1 then sent HALL a video of MV1 masturbating and ejaculating on MV2's back, face, and hair. HALL again asked MV1 to lay on MV2 and "hump him."
- 16. HALL then asked MV1 to take a family member's toothbrush and "rub the toothbrush all over these body parts for 15 seconds each: balls, dick, middle of your ass, armpits, under your feet, top of your feet and in the middle of all your toes then spit on it at the end." MV1 sent approximately 3 videos of himself rubbing a toothbrush on himself, including his penis and anus.
- 17. HALL also requested that MV1 send him a video of MV1 defecating and placing his feces inside MV2's pants.
- 18. HALL also asked MV1 to do "stuff" to another minor child under the age of 5 years old, which MV1 declined to do.
- 19. HALL described sexually molesting another minor. MV1 asked HALL if the other minor liked it, and HALL replied, "No I forced."

- 20. When MV1 tried to talk more with HALL at one point, HALL responded, "yeah and u said u wouldn't do anything with the [minor under 5 years old] so I'm not interested." MV1 offered to engage in sexual activity with a different minor, but HALL stated, "no / either someone rly young or an animal." HALL stated that a victim who was under 10 years old was not young enough, and specified that the victim should be "someone u can force."
- 21. On another occasion, HALL asked MV1 to send "100 pictures" of MV1's anus, buttocks cheeks, penis, testicles, and other body parts. MV1 sent HALL approximately 40 pictures of different body parts, including of MV1's genitalia and anus. MV1 then asked, "Is that enough", and HALL responded, "not even close", "ur at 43." HALL also requested another video of MV1 masturbating, which MV1 sent to HALL.
- 22. Based on this and other information, a federal search warrant was obtained on December 6, 2024, to search HALL's current residence in the Middle District of Florida and HALL's person. During the search of the residence, an iPhone cellular phone was seized from HALL's bed. During a physical review of HALL'S cellular telephone, numerous images and videos of CSAM were located on the device. In particular, several of the CSAM images and videos which were observed in the Telegram chats between HALL and MV1 were located on the device.

23. Agents also interviewed a family member of HALL and another witness. These individuals stated that HALL was present and residing in the Eastern District of Michigan at the time of his communications with MV1.

### **CONCLUSION**

24. Based on the foregoing, there is probable cause to believe that Antonio Hall Jr. violated 18 U.S.C. § 2251(a) (production of child pornography), 18 U.S.C. § 2422(b) (coercion and enticement of a minor), and 18 U.S.C. § 2252A(a)(2) (receipt of child pornography).

Respectfully submitted,

Eli Bowers, Special Agent

Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. Kimberly G. Altman

United States Magistrate Judge

Date: December 12, 2024